



The Bureau of the Fiscal Service

Privacy Impact Assessment

The mission of the Bureau of the Fiscal Service (Fiscal Service) is to promote the financial integrity and operational efficiency of the federal government through exceptional accounting, financing, collections, payments, and shared services.

This Privacy Impact Assessment is a Public document and will be made available to the general public via the Fiscal Service Privacy Impact Assessment (PIA) webpage (shown below).

Fiscal Service - Privacy Impact Assessments (PIA):
http://www.fiscal.treasury.gov/fsreports/rpt/fspia/fs_pia.htm

Name of System: Invoice Processing Platform (IPP)

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SYSTEM GENERAL INFORMATION:

1) System Overview: Describe the purpose of the system.

The Invoice Processing Platform (IPP) is a Web-based system that provides one integrated, secure system to simplify the management of vendor invoices. IPP assists Federal Agencies in dealings with their vendors, some of which are sole proprietors. IPP helps federal agencies avoid Prompt Payment penalties by supporting more efficient invoice processing while automating invoice collection, validation, and approval workflows. Vendors can manage their receivables more easily using one system to transact with multiple agencies. IPP saves federal agencies and vendor's time and money by automating formerly paper-based processes, and it is currently offered at no charge to customer Federal Agencies. IPP provides one integrated, secure platform located outside of agencies core financial systems. IPP improves financial management by promoting standard processes to manage government invoices with increase controls. IPP is configurable to support agencies' business rules and is compatible with existing business systems. Agencies do not deploy the IPP application within their own system environment; rather, agency systems electronically exchange files with a single centralized instance of IPP hosted within a secure Treasury infrastructure.

2) Under which Privacy Act Systems of Records Notice (SORN) does the system operate?

Provide number and name. A subset of Federal agency vendors with information in IPP may be sole proprietors. There is currently a difference of judicial opinion as to whether sole proprietors are considered individuals within the meaning of the Privacy Act. Fiscal Service current position is sole proprietors are considered PII. As such, Fiscal Service operates IPP under FMS SORN .002 – Payment Records.

3) If the system is being modified, will the SORN require amendment or revision?

☐ yes, explain.

☒ no

☐ not applicable

4) Does this system contain any personal information about individuals?

☒ yes (Federal Agency vendors who are sole proprietors)

☐ no

a. Is the information about members of the public? Yes, assuming information about sole proprietors is "information about members of the public."

b. Is the information about employees or contractors? No

5) What legal authority authorizes the purchase or development of this system?

The Fiscal Service offers IPP services pursuant to its statutory authorities to provide payment and cash management services to Federal Agencies. See 31 U.S.C. §§ 301, 321, 3325, and 3301-3343; *see also* 31 U.S.C. 3321 note, as amended.

Pursuant to 12 U.S.C. § 391, the Fiscal Service has directed a Federal Reserve Bank, in its capacity as Treasury's fiscal agent, to operate IPP.

DATA in the SYSTEM:

1) Identify the category of individuals in the system

Check all that apply:

- ☐ **Employees**
- ☐ **Contractors**
- ☐ **Taxpayers**
- ☒ **Others (Sole Proprietors)**

2) Identify the sources of information in the system

Check all that apply:

- ☐ **Public**
- ☒ **Federal Agencies**
- ☐ **State and local agencies**
- ☐ **Third party**

a. What information will be collected from employees or contractors? None

b. What information will be collected from the public? IPP does not collect information from the public.

c. What Federal agencies are providing data for use in the system?

IPP Agencies

Department of the Treasury Administrative Resource Center - ARC

African Development Foundation

Armed Forces Retirement Home

Denali Commission

DHS Office of the Inspector General

Election Assistance Commission

Farm Credit Administration

Federal Housing Finance Agency

Federal Housing Finance Agency - OIG

Federal Labor Relations Authority – Financial Management Division

Federal Mine Safety and Health Review Commission

Federal Maritime Commission

Inter-American Foundation

Merit Systems Protection Board

National Archives and Records Administration

National Mediation Board

Occupational Safety and Health Review Commission

Office of the Special Inspector General for the Troubled Asset Relief Program

U.S. Access Board

U.S. Chemical Safety and Hazard Investigation Board

US Court of Appeals for Veterans Claims

US Office of Government Ethics

Department of Housing and Urban Development

Department of the Treasury

Department of Interior

Department of Agriculture

Architect of the Capitol

Social Security Administration

d. What state and local agencies are providing data for use in the system? None

e. From what other third party sources will data be collected? None

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources, other than Fiscal Service records, be verified for accuracy?

Federal Agencies provide their vendor information through electronic files and are responsible for providing accurate information.

Vendors (including Sole Proprietors) may request to be enrolled through the Invoice Processing Platform website (www.ipp.gov). Data validation techniques, such as agency confirmation of their vendors, are used to verify the accuracy of the data.

b. How will data be checked for completeness?

When the electronic data is loaded into the system it is checked for completeness and will flag any required data fields that are missing and/or contain incorrect format.

c. What steps or procedures are taken to ensure the data is current?

Federal Agencies are responsible for uploading their vendor data on a regular basis.

d. In what document(s) are the data elements described in detail?

Data elements can be found in the IPP Vendor File Specifications.

ATTRIBUTES OF THE DATA:

a. How is the use of the data both relevant and necessary to the purpose for which the system is being designed?

IPP uses a vendor Employer Identification Number (EIN) or Taxpayer Identification Number (TIN) to establish a payment relationship between an agency and vendor to associate a payment to an invoice.

b. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? No

How will this be maintained and filed? N/A

c. Will the new data be placed in the individual's record? N/A

d. Can the system make determinations about employees or members of the public that would not be possible without the new data? N/A

e. How will the new data be verified for relevance and accuracy? N/A

f. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? N/A

- g. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? N/A**
- h. How will the data be retrieved? (If personal identifiers are used to retrieve information on the individual, explain and list the identifiers that will be used to retrieve data.)**
Data can be retrieved using a system-generated document number, Agency Location Code (ALC), vendor name, or vendor TIN/EIN.

- i. What kind of reports can be produced on individuals?**
Reports are not produced on individuals. However, users can view Invoice and Payment transaction information that may contain only the last four digits of a TIN/EIN and the vendor name. These views are used to assist agencies and their vendors in facilitating transaction processing.

What will be the use of these reports?

Reports are not produced on individuals. However, users can view Invoice and Payment Transaction information that may contain only the last four digits of a TIN/EIN and the vendor name. These views are used to assist agencies and their vendors in facilitating transaction processing.

Who will have access to them?

Agency users and IPP customer support personnel who are authorized users of the system and have a need-to-know.

- j. What opportunities do individuals have to decline to provide information (i.e., in such cases where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses)?**
All vendor users, including sole proprietors, are required to consent to the IPP Vendor Participation and Rules of Behavior Agreement. If an individual declines to accept the IPP Vendor Participation and Rules of Behavior Agreement, they will not be granted access to the system.

How can individuals grant consent?

Vendor users are presented with the IPP Vendor Participation and Rules of Behavior Agreement. If vendor users accept them, then they will be granted access to the system.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) What are the retention periods of data in this system?**
Invoice data and related documentation are kept for seven years.
- 2) How long will the reports produced be kept?**
Reports are not produced on individuals. However, users can view Invoice and Payment Transaction information that may contain only the last four digits of a TIN/EIN and the vendor name.
- 3) What are the procedures for disposition of the data at the end of the retention period?**
The data is purged at the end of the retention period.

Where are the disposition procedures documented?

This process is automated in the application and documented in the Bureau of the Fiscal Service Records Management Plan.

- 4) **If the system is operated in more than one site, how will consistent use of the system and data be maintained at all sites?** N/A
- 5) **Is the system using technologies in ways that Fiscal Service has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?** No
- 6) **How does the use of this technology affect employee or public privacy?**
The technology does not affect employee or public privacy.
- 7) **Will this system provide the capability to identify, locate, and monitor individuals?**
If yes, explain.
N/A
- 8) **What kind of information is collected as a function of the monitoring of individuals?**
N/A
- 9) **What controls will be used to prevent unauthorized monitoring?**
The infrastructure provides a standard suite of security tools to prevent unauthorized monitoring activities.

ACCESS TO DATA:

- 1) **Who will have access to the data in the system?**
Check all that apply:
 - ☐ **Contractors**
 - ☒ **Users**
 - ☒ **Managers**
 - ☒ **System Administrators**
 - ☐ **System Developers**
 - ☐ **Others**
- 2) **How is access to the data by a user determined?**
An Agency nominates an employee as a primary administrator for their IPP account. The primary administrator then determines which agency users are authorized to process transactions in IPP based on their need-to-know and principles of least privilege.

Are criteria, procedures, controls, and responsibilities regarding access documented?
Yes
- 3) **Will users have access to all data on the system or will the user's access be restricted? Explain.** No, agency users only have access to a subset of data for their agency based on the permissions assigned in the system. Vendors/sole proprietors can only access information related to them.
- 4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**
Users are provided credentials via the User Provisioning Services. IPP users are authenticated using their user ID and password when requesting access to the IPP Application. A user's ability to view information after authentication is further restricted

based on the roles assigned to them in IPP by their agency on the principles of least privilege. All user and system to system transactions are logged and reviewed on a period basis. Users are also recertified on an annual basis to determine their need for continued access to IPP.

- 5) **If contractors are/will be involved with the design, development or maintenance of the system, were Privacy Act contract clauses inserted in their contracts and were other regulatory measures addressed?**

Yes

- 6) **Do other systems share data or have access to the data in the system?**

X yes

— no

If yes,

a. Explain the interface.

Agency financial systems share data with IPP, which agency vendors can access. Vendors can only access information relating to them. The purpose of this sharing is administrative. It is not for “matching program” purposes under the Privacy Act, as amended.

In addition, on a monthly basis, IPP provides information to Fiscal Service’s Do Not Pay program, which compares it to the public Excluded Parties List (which is not a Privacy Act System of Records). Fiscal Service does not take any adverse action against a vendor/sole proprietor in the event of a “hit.” Rather, information is passed back to the agency which has the contract with the vendor/sole proprietor to determine, under the agency’s own authorities, whether the vendor/sole proprietor should continue to receive payments from it. Specific authorization from vendors/sole proprietors for this information sharing is obtained prior to their enrollment in IPP.

b. Identify the role responsible for protecting the privacy rights of the public and employees affected by the interface.

The following are referenced roles:

Chief Information Officer (CIO) is responsible for providing executive oversight and leadership for Fiscal Service’s security program and advising the Commissioner on significant security issues.

Chief Privacy Officer (CPO) is the Fiscal Service senior management official who ensures the implementation of information privacy protections, including compliance with federal laws, regulations, and policies relating to information privacy, such as the Privacy Act.

Chief Information Security Officer (CISO) is the Fiscal Service senior management official who ensures the implementation of Fiscal Service information security program and provides day to day oversight and guidance on information security matters.

The **IPP Business Line Executive Sponsor, Information Security Officer and System Owner** are responsible for ensuring that the application meets Fiscal Service's security and privacy policies and that agency and vendor information is adequately protected.

7) **Will other agencies share data or have access to the data in this system?**

☒ **Yes**

☐ **No**

If yes,

a. Check all that apply:

☒ **Federal**

☐ **State**

☐ **Local**

☐ **Other (explain) _____**

b. Explain how the data will be used by the other agencies.

Federal agencies have access to information in IPP relating to contracts with their vendors. They will use this information to process invoices for payment which are received from their vendors.

c. Identify the role responsible for assuring proper use of the data.

Chief Information Officer (CIO) is responsible for providing executive oversight and leadership for Fiscal Service's security program and advising the Commissioner on significant security issues.

Chief Privacy Officer (CPO) is the Fiscal Service senior management official who ensures the implementation of information privacy protections, including compliance with federal laws, regulations, and policies relating to information privacy, such as the Privacy Act.

Chief Information Security Officer (CISO) is the Fiscal Service senior management official who ensures the implementation of Fiscal Service information security program and provides day to day oversight and guidance on information security matters.

The **IPP Business Line Executive Sponsor, Information Security Officer and System Owner** are responsible for ensuring that the application meets Fiscal Service's security and privacy policies and that agency and vendor information is adequately protected.

See above answers to "Access to Data" questions 2 through 4 for discussion of roles at agencies which share data with IPP.